

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

HANAN ELATR KHASHOGGI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:23-cv-00779-LMB-LRV
)	
NSO GROUP TECHNOLOGIES)	
LIMITED, <i>et al.</i> ,)	
)	
Defendants.)	

MOTION FOR ALTERNATE HEARING DATE

Plaintiff, Hanan Elatr Khashoggi (“Plaintiff”) hereby respectfully moves the Court for an alternative date to hear oral argument on Defendants’ Motion to Dismiss (ECF 26).

Lead counsel for the Plaintiff, Michael J. Pendell, is not available for a hearing the week of October 23, 2023, including on October 24, 2023, the date for which the hearing is currently set (ECF 33). Mr. Pendell will be traveling that week for a long-planned vacation and will incur significant personal expense if those travel arrangements must be cancelled.

When Plaintiff’s counsel and Defendants’ counsel met and conferred and discussed mutually available times for a hearing for both parties’ lead counsel, both parties’ counsel were unaware that a hearing date could be set on a date other than the Court’s usual Friday hearing schedule. Understanding that the hearing would take place slightly outside of Local Rule 7(E)’s 30-day requirement, Plaintiff respectfully requests that the hearing take place any day or time during the following week of October 30, 2023, or any time thereafter.¹ In the alternative, should Mr. Pendell have to cancel part of his travel plans, it would reduce the personal burden on Mr.

¹ To be clear, Plaintiff will not contend that Defendants’ Motion to Dismiss is withdrawn in any way by scheduling a hearing date outside thirty days from its filing, nor does Plaintiff intend to waive oral argument on the Motion to Dismiss.

Pendell to be present at a hearing at the end of the week, and respectfully requests a hearing during the routine Friday hearing schedule on Friday October 27, 2023, if the Court is not inclined to set a later hearing date.

Accordingly, Plaintiffs respectfully request the Court schedule a hearing on Defendants' Motion to Dismiss for any day or time after October 27, 2023, or in the alternative, on Friday October 27, 2023.

Dated: October 4, 2023

By: /s/ Annie E. Kouba
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on October 4, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will notify all counsel of record.

/s/ Steven T. Webster
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